## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

Rene Cardoso,	)
Plaintiff,	) MITCHELL MECHANICAL, LLC'S ) MOTION IN LIMINE TO EXCLUDE
v.	) PLAINTIFF'S EXPERTS JULIE SAWYER-LITTLE AND OLIVER
Mitchell Mechanical, LLC,	) WOOD
Defendant.	) C.A. No. 2:16-cv-1058-PMD

PLEASE TAKE NOTICE that the defendant, Mitchell Mechanical, LLC ("Mitchell"), moves this Court for an order excluding the plaintiff's experts, Julie Sawyer-Little and Oliver Wood's reports and them from testifying at trial. Mitchell's motion is based upon the following grounds:

- 1. The plaintiff has designated Julie Sawyer-Little to evaluate the plaintiff's vocational potential and future life care/medical needs and Oliver Wood to calculate the alleged financial loss as dictated by Ms. Sawyer-Little's report and to reduce those figures to present value.
- 2. Ms. Sawyer-Little's opinions will not help the trier of fact determine a fact in issue, are unreliable, and should be excluded pursuant to Rule 702 of the Federal Rules of Evidence. *See Daubert v. Merrell Dow Pharm., Inc.,* 509 U.S. 579, 589, 113 S. Ct. 2786, 2794, 125 L. Ed. 2d 469 (1993).
- 3. Because Mr. Wood's opinions rely on those proffered by Ms. Sawyer-Little, which are unreliable, Mr. Wood's opinions likewise should be excluded pursuant to Rule 702 of the Federal Rules of Evidence.

This motion is based upon the complaint that has been filed in this action, affidavits filed or to be filed, discovery conducted or to be conducted, depositions taken or to be taken, Mitchell's Memorandum of Law in Support of its Motion, filed herewith, the expert reports of Julie Sawyer-Little and Oliver Wood, the Federal Rules of Civil Procedure, and the applicable common and statutory law.

WHEREFORE, Mitchell Mechanical, LLC requests that this Court grant its Motion in Limine to Exclude Plaintiff's Experts Julie Sawyer-Little and Oliver Wood.

s/ Phillip E. Reeves

Phillip E. Reeves (Fed. ID No. 3232) T. David Rheney (Fed ID No. 5030) Nicholas A. Farr (Fed. ID No. 11069) Gallivan, White & Boyd, P.A. Post Office Box 10589, F.S. Greenville, South Carolina 29603 (864)271-9580

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Greenville, SC July 7, 2017 Attorneys for Defendant, Mitchell Mechanical, LLC